



City of Huntington Beach

2000 Main Street ♦ PO Box 190 ♦ CA 92648

Travis K. Hopkins, PE
Director

October 19, 2010

Department of Public Works
(714) 536-5431

Mark Smythe
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3348

Subject: Amendment of Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County, Areawide Urban Storm Water Runoff Permit (R8-2009-0030, NPDES No. CAS618030, MS4 Permit)

Dear Mr. Smythe:

The City of Huntington Beach is submitting this letter of support in regards to the October 29, 2010 Regional Water Quality Control Board Meeting Item Number 7, Amendment of Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County, Areawide Urban Storm Water Runoff Permit (R8-2009-0030, NPDES No. CAS618030, MS4 Permit).

As Co-Chair of the Permittee Advisory Group (PAG) and Technical Advisory Group (TAG), I can attest to the County of Orange and the Co-Permittees diligent efforts in meeting the New Development deadlines as set forth in the MS4 Permit, adopted on May 22, 2009. The Model Water Quality Management Plan (MWQMP) and Technical Guidance Documents (TGD) were submitted to the staff of the Regional Water Quality Control Board on May 24, 2010. Since the receipt of the comments from the Regional Board staff, the County of Orange has discussed with the Co-Permittees the comments and issues before them.

At the September 27, 2010 meeting between the County of Orange and Regional Board staff, the following items were discussed:

- Major reorganization/refinement of the MWQMP and TGD to address Regional Board comments and improve usability and transferability;
- Development of implementation materials concurrently with finalization of the MWQMP and TGD to ensure consistency among all program documents;
- Development of training materials and programs to prepare developers, engineers and plan checkers for smooth transfer to the new Project WQMP;

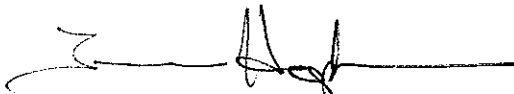
- Development of the model Watershed Master Plan concurrent with finalization of the MWQMP and TGD to ensure consistency among documents and ensure these documents work together as intended by the Regional Board staff;
- Preparation of an economic analysis concurrently with finalization of the MWQMP and TGD such that results can be embedded in these documents and integrated into the feasibility criteria as appropriate;
- Coordination with Riverside and San Bernardino County stormwater programs to improve consistency between programs and develop common implementation/ transitional materials, possibly including a common geo-database; and
- Development of the WQMP Template, and parallel efforts being conducted by Riverside County and San Bernardino County permittees.

As stated previously, the City of Huntington Beach is in support of the amendments as stated in the Staff Report dated October 29, 2010 as follows:

- Order No. R8-2009-0030, page 47, Section XII.A.2 – revising the timeframe for amending the LIP to be consistent with the Guidance Document;
- Order No. R8-2009-0030, page 52, Section XII.B.6 – revising the date to develop recommendations for streamlining regulatory agency approval of regional treatment control BMPs;
- Order No. R8-2009-0030, page 53, Section XII.C.1 – revising the date for the Executive Officer approval of the feasibility criteria; and
- Order No. R8-2009-0030, page 58, Section XII.D.5 – revising the date for the maps and a model plan for one watershed to be prepared by.

I would like to thank you for the opportunity to submit my letter in support of the Regional Board's staff recommendations. If you have any questions, please feel free to contact me at THopkins@surfcity-hb.org.

Sincerely,



Travis K. Hopkins, PE
Director of Public Works

TKH/TE:jg

C: Chris Crompton, OC Watersheds
Tony Olmos, City Engineer
Terri Elliott, Principal Civil Engineer